Before the
**FEDERAL COMMUNICATIONS COMMISSION**
Washington, D.C. 20554

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| In the Matter of | ) | |
| | ) | |
| Expanding Flexible Use of the 3.7 to 4.2 GHz Band | ) | GN Docket No. 18-122 |
| | ) | |
| Expanding Flexible Use in Mid-Band Spectrum Between 3.7 and 24 GHz | ) | GN Docket No. 17-183 (Inquiry Terminated as to 3.7-4.2 GHz) |
| | ) | |
| Petition for Rulemaking to Amend and Modernize Parts 25 and 101 of the Commission's Rules to Authorize and Facilitate the Deployment of Licensed Point-to-Multipoint Fixed Wireless Broadband Service in the 3.7-4.2 GHz Band | ) | RM-11791 |
| | ) | |
| Fixed Wireless Communications Coalition, Inc., Request for Modified Coordination Procedures in Band Shared Between the Fixed Service and the Fixed Satellite Service | ) | RM-11778 |

## COMMENTS OF WORLD TELEPORT ASSOCIATION

World Teleport Association ("WTA") submits these comments in response to the above-captioned Notice of Proposed Rulemaking ("NPRM") in which the Federal Communications Commission solicits feedback on proposals to permit terrestrial mobile use of the 3700-4200 MHz band (the "C-band").[1] We have three primary goals in submitting these comments: (1) make perfectly clear that the C-band content distribution services provided by satellite operators are essential to the business of our members; (2) support the market-based approach of Intelsat License LLC, SES Americom, Inc., and Intel Corporation proposed in the NPRM to allow terrestrial mobile use of the C-band;[2] and (3) oppose new fixed point-to-multipoint ("P2MP")

[1] *Expanding Flexible Use of the 3.7-4.2 GHz Band*, Order and Notice of Proposed Rulemaking, GN Docket No. 18-122, FCC 18-91 (rel. July 13, 2018).
[2] *See* NPRM ¶¶ 66-97.

services in the C-band and associated proposed limits on full-band, full-arc protection for satellite earth stations.

World Teleport Association is a nonprofit association of satellite service providers operating teleports in countries around the world. We represent 24 companies with teleport operations in the United States, most of whom use C-band satellites to provide services.

The C-band forms the backbone of the infrastructure content companies use to supply consumers across the country with premium video programming as well as data services into high-rainfall regions, where Ku-band and Ka-band are adversely affected by weather. Any change in the current C-band operating environment could negatively affect their businesses and American consumers and businesses they serve.

C-band offers reliability, quality, and cost efficiency that cannot be matched by other technologies or in other satellite spectrum. It is the most cost-effective means for delivering video, because a single transmission can reach an unlimited number of end users, compared with fiber or internet delivery, which involves an individual stream to each end user. For mission-critical data communications to first responders, military operations, energy exploration and production and maritime operations, it is core national infrastructure

Moreover, the record suggests that co-frequency sharing between terrestrial mobile services and satellite operations is not feasible. As the NPRM recognizes, because signals from satellites are very weak when they reach the ground, terrestrial mobile operations could cause harmful interference to earth stations over large distances.[3] Any risk of interference to the C-band satellite services on which WTA member companies rely is unacceptable, not only from a business revenue perspective, but because it jeopardizes the ability of American consumers to

[3] *See* NPRM ¶ 50.

receive the programming content they want and the ability of first-responders to support disaster response and recovery.

The proper management of the future of the C-band is critical to the continued vitality of our business. Thus, we believe that a market-based approach, led by satellite operators, is the only practical solution for introducing terrestrial mobile operations in the C-band. Cable, systems, broadcasters, content delivery companies and teleports have been working with satellite operators for decades. We are their customers, and they understand our needs and have direct knowledge of our operations. Consequently, satellite operators are best positioned to protect incumbent users while also undertaking the arduous and costly task of clearing spectrum for terrestrial mobile use. We urge the Commission to move forward with the market-based solution discussed in the NPRM.[4]

Finally, the Commission should not allow new P2MP services in the C-band or restrict the protection of C-band earth stations across the full spectrum band and the visible satellite arc.[5] The flexibility to change frequencies and receive antenna orientations is essential to the value of the C-band satellite capacity on which WTA member companies and others rely. This flexibility allows restoration of service if an outage affects our members' primary space segment and facilitates the resolution of interference issues, as well as enabling our members to take advantage of competition among satellite operators. The requirement to work around new P2MP facilities would undermine the nationwide reach of C-band service, and the requirement to modify earth station licenses for any change in operating parameters would impose significant and unjustified regulatory burdens. World Teleport Association urges the Commission to focus

[4] *See* NPRM ¶¶ 66-97.
[5] *See* NPRM ¶¶ 37-40 & 116-132.

on other spectrum that is not as intensely used as the C-band to meet any requirements for additional frequencies suitable for P2MP operations.

Respectfully submitted,

World Teleport Associatino

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